

**UNITED STATES DISTRICT COURT
FOR THE WESTERN TENNESSEE DIVISION**

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SAMANTHA D. RAJAPAKSE

PLAINTIFF

v.

Civil Docket 13-2328-SA-dv

**BAKER DONELSON BEARMAN
BERKOWITZ AND CALDWELL
ET AL**

**CITY OF MEMPHIS
LAW DIVISION
HERMAN MORRIS
ROBERT RATTON, III**

Defendants

**ENFORCE TRUSTEE TO START THE INITIATION OF DEBTOR'S
INVENTORY OF ASSETS FOR THE COMMERCIAL LIEN SEEKING
FINANCIAL REPORTS FROM ALL PARTIES**

Plaintiff, Samantha D. Rajapakse do hereby request for the court to start initial to enforce liens filed on May 20th, 2013 against David L. Bearman as a shareholder of Baker, Donelson, Bearman, Berkowitz, and Caldwell, all shareholders listed as well as officers and partners or of counsel and lien filed May 30th against Memphis, Light, Gas, and Water, its shareholder and official, President, Jerry Collins as an Official and Individual assets as an individual in whole and in part, Herman Morris, as an Official and Individual assets as in whole or in part, A. C. Wharton as an Official and individual assets as in whole and in part.

This shall be enforce by the Assigned Trustee on behalf of the secured parties in seeking liquidation of assets to satisfy both Commercial Liens recorded before this court. The court shall instruct all parties to comply with being truthful and complete with this inventory.

The court shall sanction all parties with severe civil penalties for those who fail, withhold, deceit, or fraudulent provide the court with all assists.

Both liens will be called to satisfy after 60 days of filing before this court. Both liens have filed properly. Baker Donelson with the State of Washington, City of Memphis, MLGW with the State of Tennessee Comptroller's office of Audit.

Plaintiff seek financial statements from all parties related to within (12) months to (3) three years or to the for each party listed in the lien as debtor., municipal, or government and (5) years or less.

The request for all documents are to be surrendered to the Trustee, Judge S. Anderson no later than 30 days **July 6, 2013** in federal court and the secured party to review and inspect of all documents.

- 1.
2. List all Name, address, and phone numbers and location of all accounts in the name of David L. Bearman sole and jointly with in whole or jointly. Including all savings account, checking accounts, college fund accounts, Mutual funds, IRA, Stock Option, Annuity account, money market accounts, business accounts, retirement accounts, 401K, and all other accounts not listed but under the authorization or control listed.
3. List the names of all properties including business and commercial property and addresses associated with David L. Bearman, either jointly or solely location and the value of the property.
4. List all names of all residential properties associated in the name of David L. Bearman including all rental, joint property, the name(s) of others acting on behalf of you as an agent.
5. List all employment including names, addresses, and phone number, gross pay annually, including all self employ salary, bonuses, insurance dividends, and other income not mention as employment salary including consultant, speaking engagements,
6. List all earnings from any books written, magazine articles written, any lectures
7. Name and addresses including policy number of all Malpractice insurance, policy, coverage.
8. List all billable fees associated with the City of Memphis and Memphis Light Gas and Water including litigation fees for(12) months. And for each litigant.
9. List gross salary for Shareholder, David L. Bearman employed with Baker Donelson Bearman Berkowitz, and Caldwell for 2012 and 2013 as reported to the Internal Revenue

10. List all bonding insurance, name, address, policy associated with David L. Bearman profession.
11. Name and address of all life insurance policies with David L. Bearman as beneficiary or insurer with any cash value and the amount or as insurer.
12. List all Art work, coins, collectables or other valuables any in whole or in part of belonging to David L. Bearman
13. List all gifts over 100.00 given to David L. Bearman or David L. Bearman has given as a given. Within the past 12 months Please specify.
14. List all vehicles name, make model in the name in whole or in part belonging to David L. Bearman and any which has been transferred within the past 90 days. Please provide the name of the party on transfer within (12) months
15. List all vehicles registered in the name of David L. Bearman.
16. List all transfer of property in the past 12 months in which David L. Bearman benefited or received a profit.
17. List all household items in the residential home in whole or in part of David L. Bearman including all electronics, appliances, outdoor furnishings and include value and date of purchase.
18. List all valuables including all jewelry on your property or in a safe deposit box
19. List all safe deposit box, location including name, address, and contents of the box.
20. List all hobbies of value (ie wood carving machinery, pottery) which you have invested in the name of David L. Bearman.
21. List all rental property, location and value in whole or in part in the name of David L. Bearman.
22. List all properties which has been sold or purchased in whole or in part in the name of David L. Bearman. Please state all location
23. List all unused vacation days or leave which could be used as income or cash payment.
24. List all commercial accounts for Baker Donelson including names, address, and phone numbers and location .
25. List tax year income 2012-2013 year as reported to the Internal Revenue by Baker Donelson Bearman Berkowitz and Caldwell
26. List all reserve accounts, including petty cash accounts, accounts for events, budgeting, fundraiser List all reserve accounts, including petty cash accounts, accounts for events, budgeting, fundraiser, List all reserve accounts, including petty cash accounts.
27. List All Malpractice and Bonding of all shareholders of Baker Donelson including officers, partners, and coverage of Counsels as stated in the lien filed before this court

28. List all inventory including office furniture, office paintings, office equipments paid for from all locations listed in the lien and by all shareholders, officers, and its agents.
29. List all contracts where a profit will be made of all Clients of on going fees regarding income for the firm
30. List all investments for Baker Donelson including foreign accounts with names addresses and phone numbers of location of accounts.
31. List all collateral in the name, addresses, location and value in whole or in part of Baker Donelson.
32. List all Art work ,valuables, and investments of Baker Donelson
33. List all Residential property location and value of all shareholders including David L. Bearman and the value of property.
34. List all income for Robert Ratton, III including bonuses, pay raises, fees for lecturing, teaching from the City of Memphis and all other income. Put name, address and phone number of employment and include salary.
35. List all property addresses and location in whole or in part including value in the name of Robert Ratton, III.
36. List all residential, rental, or commercial property purchased sold within the last 12 months in whole or in part of Robert Ratton, III.
37. List all accounts, name, addresses and amount in the name of Robert Ratton, III
38. List all retirement accounts, college fund account, IRA, Mutual funds, 401K , checking, savings, money market account annuities. And all other account not directly mention solely or jointly in name.
39. List all vehicles, name, make and model in the name in whole or in part belonging to
40. List all jewelry value amount, location and all jewelry which has been given as a gift in the past 90 days.
41. List all Safe deposit boxes in whole or in part of Robert Ratton, III including name, location of deposit box and its contents of value.
42. List all household items in whole or in part of Robert Ratton, III. Including appliances, electronics, and outside furnishings and value.
43. List all tax years for 2012-2013 as report to the Internal Revenue in whole or in part for Robert Ratton, III.
44. List all hobbies of value (ie wood carving machinery, pottery) which you have invested for Robert Ratton, III.
45. List all rental property, location and value in whole or in part in the name of Robert Ratton, III.

46. List all unused vacation days or leave which would could be used as income or cash payment for Robert Ratton, III.
47. List in whole or in part all contracts, name address and phone number where earnings in whole or in part would profit Robert Ratton, III.
48. List all rental properties, names, location and value listed in whole or in part in the name of Herman Morris
49. List all gross salary from the City of Memphis for Herman Morris including bonus, pay raises as reported on his 2012 -2013 taxes to Internal Revenue.
50. List current pay raise for Herman Morris provided by the City of Memphis
51. List residential home in whole or in part in the name of Herman Morris
52. List all household items in whole or in part of the residential property of Herman Morris including outdoor furnishings and value.
53. List all properties sold or purchased within the past 90 days in the name of Herman Morris.
54. List all art works, coins, sculptures, wine collection in whole and in part belonging to Herman Morris.
55. List all contracts, name, location where earnings in whole or in part in the name of Herman Morris.
56. List all business association with any Limited Liability companies, limited practice, associated with Herman Morris.
57. List all financial statement of all businesses associated with Herman Morris in whole or in part as reported from 2012-2013 to the Internal Revenue.
58. List all accounts listed as sole, joint, or beneficiary including college funds, retirement account, business account which you are authorized to sign including checking savings.
59. List all life insurance policies name of company with cash value, insurance policies on dividends, policy where income can be generated active policy on Herman Morris.
60. List all additional income not mentioned in whole or in part from Herman Morris.
61. List all vacation days or leave which would could be used as income or cash payment of Herman Morris.
62. List all gross income included all bonus, pay raises as reported in 2012-2013 of Internal Revenue in whole or in part of Jerry R. Collins.
63. List all insurance policies, name and location of policies where cash and interest in whole and in part of Jerry R. Collins.
64. List all accounts, name, address, and phone numbers, location in sole and jointly or as an acting agent for Jerry Collins.

65. List all rental property in whole or in part, location including address, value how much is rent in whole or in part of Jerry R. Collins.
66. List all household items including outdoor furnishings in whole and part, value. Include all electronics and value as well of Jerry Collins.
67. List all financial statements from profit sharing, 401k, retirement, annuities, bonds, mutual funds, stock options, and all other income as reported in 2012-2013 to the Internal revenue in the name of Jerry Collins.
68. List all coin collection, antiques, wine collection, and all other valuables which you have collected the location and the value of the collection of Jerry R. Collins.
69. List all gross income of employment of A. C. Wharton including bonus, pay raise within the last 12 months as stated in 2012-2013 as reported to the Internal Revenue.
70. List current pay raise received by A. C. Wharton in his official capacity as Mayor of Memphis.
71. List all assets, location, and value associated with business as a shareholder, owner, partner, or authorized agent of A. C. Wharton.
72. List all insurance policies name of company and cash in value or policies as a beneficiary in the name of A. C. Wharton.
73. List all properties transferred, gifted, or sold in the past 90 days in the name of A. C. Wharton in whole or in part and value of the sale and the name of the other party.
74. List all securities, annuities, profit sharing, shareholding, financial statements including all location of items.
75. List all household items and their value for the residential in whole or in part of A. C. Wharton,
76. List all hobbies and its equipment location and value in whole and in part of A. C. Wharton.
77. List all businesses in whole and in part in the name or agent, officer, partner, shareholder in whole and in part of A. C. Wharton.
78. List all contracts, name addresses and phone number where a income, profit or earnings will be in whole or in part of A. C. Wharton.
79. List of all properties sold, bought or transferred, location and value within the past 90 days in whole or in part of A. C. Wharton.
80. List all funds set aside for college funds, grandchildren, stepchildren children other than by your spouse, name and location of funds and amount.
81. List all contracts and location of rental property, leases, contract involving business in A. C. Wharton in whole or in part.
82. List all Commercial properties listed in the Municipal Corporation of Memphis, Light, Gas, and Water.

83. List all revenue generated from Memphis, Light, Gas and Water including profits from the sale of utilities and equipment sold to customers.
84. List all equipment of Memphis, Light, Gas, and Water which has been sold in auctions as profit and amount sold for the past 12 months.
85. List all equipment vehicles of Memphis, Light, Gas and Water and its value as well as location for officials and management staff use.
86. List all accounts, location for Memphis Light Gas and Water including profit sharing, retirement, 401K,
87. List all reserve accounts listed in Memphis, Light, Gas and Water
88. List all collateral assets of the City of Memphis, including vehicles used by Management for business use.
89. As stated in # the value of all vehicles used by management for city use blue book value of fleet.
90. List all contracts for the benefit of the City of Memphis which a profit (fed ex form, pyramid).
91. List all contract in the name of City of Memphis in which expectant payment (loans from contractors or small businesses).
92. Give name and location and amount of all transaction of all property sold to or through the City of Memphis in which A. C. Wharton received a profit .
93. Give the name and location and value of all transaction of all property sold under the name of the City of Memphis in which a profit has been made.
94. Give the name and location and value of all transactions of all land taken under Memphis Light Gas and Water doing business under the City of Memphis.
95. List all pending contract with other companies or venders which would generate revenue.
96. List all reserved account and cash with each departments in the City of Memphis.
97. List all interested properties, contracts, residual income and all other income, profit, properties not mentioned in detail with the city of Memphis or Memphis Light Gas and Water.
98. List all interested properties, contracts, residual income and all other income, profit, properties not mentioned in detail with Baker Doneslon Bearman Berkowitz, and Caldwell.
99. List all interested properties, contracts, residual income and all other income, profit, properties not mentioned in detail with David Bearman
100. List all interested properties, contracts, residual income and all other income, profit, properties not mentioned in detail with Robert Ratton, III.
101. List all interested properties, contracts, residual income and all other income, profit, properties not mentioned in detail with Jerry R. Collins

102. List all interested properties, contracts, residual income and all other income, profit, properties not mentioned in detail with A. C Wharton
103. List all interested properties, contracts, residual income and all other income, profit, properties not mentioned in detail with Herman Morris

IT IS THEREFORE, CLAIMANT/PLAINTIFF REQUEST:

1. The Court, acting as Trustee initiate All assets request to be submitted before the court within 30 days of the filing of this request.
2. The Assigned Trustee acknowledge this request and order the Defendants to comply.
3. Any violation of this request by the Debtor/Defendants shall occur additional sanctions by the court.

Respectfully Submitted,



Samantha D. Rajapakse
5261 Algiers Drive
Memphis, TN 38116
901-236-0744

CERTIFICATE OF SERVICE

A copy of this request before the United States District Court acting as Trustee on behalf of Plaintiff/Claimant has been submitted to Baker Donelson Bearman Berkowitz and Caldwell and the City of Memphis on 3rd of June 2013 by fax and mail.

Respectfully,

Samantha D. Rajapakse